

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 2 CASES LISTED IN  
EXHIBIT A OF DEFENSE NOTICE OF  
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF DAUBERT RESPONSE OF  
JERRY BLAIVAS, M.D. FOR WAVE 2**

Come now, the Plaintiffs, and hereby adopt and incorporate by reference Plaintiff's  
Opposition filed in response to Defendants' Motion to Exclude the Testimony of Jerry Blaivas,  
M.D. for Ethicon Wave 3, Dkt. 2947 (attached as Exhibit A). Plaintiffs respectfully request that  
the Court deny Defendants' motion, for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

Date: October 26, 2016

By: s/Fidelma L. Fitzpatrick  
Fidelma L. Fitzpatrick  
Motley Rice LLC  
321 South Main Street  
Providence, RI 02903  
Phone: (401) 457-7700  
Fax: (401) 457-7708  
[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)

Fred Thompson, III  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Phone: (843) 216-9000  
Fax: (843) 216-9450  
[ftompson@motleyrice.com](mailto:ftompson@motleyrice.com)

Attorneys for Plaintiffs